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12 Attorneys for Defendants

13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 OAKLAND DIVISION  
17

18 SHINLI CHI, an individual, on his own behalf  
and on behalf of all others similarly situated,

19  
20 Plaintiffs,

21 v.

22 SONY NETWORK ENTERTAINMENT  
AMERICA, INC.; SONY COMPUTER  
ENTERTAINMENT AMERICA LLC; SONY  
23 NETWORK ENTERTAINMENT  
INTERNATIONAL LLC; SONY COMPUTER  
24 ENTERTAINMENT AMERICA, INC.; and  
DOES 1-10,

25  
26 Defendants.  
27  
28

Case No. 3:11-cv-02081-LB

**STIPULATION TO EXTEND  
TIME FOR DEFENDANTS TO  
MOVE, ANSWER, OR  
OTHERWISE RESPOND TO  
COMPLAINT**

Judge: Magistrate Judge Laurel Beeler

1 WHEREAS, defendants Sony Network Entertainment America, Inc., Sony Computer  
2 Entertainment America LLC ("SCEA") (f/k/a Sony Computer Entertainment America, Inc.), and  
3 Sony Network Entertainment International LLC ("SNEI"), as well as certain related entities  
4 (collectively, the "Sony Defendants"), have been named as defendants in at least twenty-one (21)  
5 putative class action lawsuits within this District, to date;

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at  
7 least eighteen (18) putative class action lawsuits pending outside this District, to date;

8 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict  
9 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed  
10 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,  
11 2011.

12 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is May  
13 25, 2011;

14 WHEREAS, the parties have agreed to the extension of time herein for the defendants in  
15 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to  
16 facilitate the scheduling of this matter in coordination with the schedule for the motion before the  
17 JPML;

18 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,  
19 by and through their respective counsel, hereby stipulate as follows:

20 The deadline for the defendants to respond to the Complaint in the above-captioned action  
21 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict  
22 litigation centralizing the above-captioned action with other matters, or if centralization is denied  
23 by the JPML, then 30 days from the date of such order denying centralization.

24 Either party may seek ex parte relief from this stipulated Order for good cause shown,  
25 including, but not limited to, Defendants' filing of a responsive pleading in a related case.  
26  
27  
28

1 Dated: May 18, 2011

TINA WOLFSON  
ROBERT AHDOOT  
AHDOOT & WOLFSON, APC

4 By: /s/ Robert Ahdoot /s/ [as authorized]  
Robert Ahdoot

6 Attorneys for Plaintiff  
SHINLI CHI

8 Dated: May 18, 2011

HARVEY WOLKOFF  
THAD A. DAVIS  
ROCKY C. TSAI  
ROPES & GRAY LLP

11 By: /s/ Rocky C. Tsai /s/  
Rocky C. Tsai

13 Attorneys for Defendants  
SONY NETWORK ENTERTAINMENT  
AMERICA, INC.; SONY COMPUTER  
ENTERTAINMENT AMERICA LLC;  
SONY NETWORK ENTERTAINMENT  
INTERNATIONAL LLC

16 **[PROPOSED] ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED

19 Dated: May 20, 2011

20 By:

